

**IN THE UNITED STATES DISTRICT COURT  
FOR THE NORTHERN DISTRICT OF ILLINOIS  
EASTERN DIVISION**

TRUSTEES OF THE CHICAGO PAINTERS	)	
AND DECORATORS PENSION FUND,	)	
TRUSTEES OF THE CHICAGO PAINTERS	)	
AND DECORATORS WELFARE FUND,	)	
TRUSTEES OF THE CHICAGO PAINTERS	)	
AND DECORATORS DEFERRED SAVINGS	)	
FUND, TRUSTEES OF THE CHICAGO	)	
PAINTERS AND DECORATORS	)	
APPRENTICESHIP FUND, TRUSTEES OF	)	
THE CHICAGO PAINTERS AND	)	
DECORATORS SCHOLARSHIP FUND,	)	
TRUSTEES OF THE CHICAGO	)	No. 25-cv-6788
PAINTERS AND DECORATORS JOINT	)	
COOPERATION TRUST FUND AND	)	
TRUSTEES OF THE CHICAGO PAINTERS	)	
AND DECORATORS RETIREMENT SAVINGS	)	
FUND	)	
	)	
Plaintiffs,	)	
	)	
	)	
v.	)	
	)	
VISION PAINTING & DECORATING	)	
SERVICES, INCORPORATED,	)	
an Illinois corporation	)	
Defendants.	)	

**STATUS REPORT**

The Parties, by and through their attorneys hereby submit this Initial Status Report, as follows:

**1. The Nature of the Case**

**A. Attorneys of Record**

Plaintiffs:

Paul M. Egan  
James R. Anderson  
Grant R. Piechocinski  
Arnold and Kadjan, LLP

Defendant:

Todd A. Miller  
Allocco, Miller & Cahill, P.C.  
20 N. Wacker Drive, Suite 3517  
Chicago, IL 60606

35 East Wacker Drive, Suite 600  
Chicago, IL 60601  
(312) 236-0415

(312) 675-4325

B. Nature of the Claims Asserted in the Complaint

Defendant is signatory to a Collective Bargaining Agreement which requires it to make periodic contributions to the Plaintiffs and to submit books and records for a fringe benefit contribution compliance audit. The Complaint seeks a fringe benefit fund contribution compliance audit for the period beginning **October 1, 2024 through the present.**

2. **Status of Audit and Settlement Discussions**

- A. **Status of Audit** – Audit is still in progress. The auditor needs additional documents to complete the audit.
- B. **Status of Settlement Discussions** – Settlement discussions have not taken place, because the audit is not yet complete.

Respectfully submitted,

**TRUSTEES OF THE CHICAGO PAINTERS  
AND DECORATORS PENSION FUND, et al.,**

By: /s/ Grant R. Piechocinski  
One of their Attorneys

ARNOLD AND KADJAN LLP  
35 E. Wacker Dr., Ste. 600  
Chicago, Illinois 60601  
(312) 236-0415